

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

CLEBERSON QUADRELLI, EVENS
DRY, and ABDY NIZEYIMANA, on
behalf of themselves and all others
similarly situated,

Petitioners,

v.

ANTONE MONIZ, Superintendent of the
Plymouth County Correctional Facility,

Respondent.

C.A. No. 20-10685-ADB

**NOTICE OF SUPPLEMENTAL AUTHORITY
REGARDING PETITIONERS' MOTIONS FOR LEAVE TO FILE
SECOND AMENDED PETITION AND FOR CLASS CERTIFICATION**

Petitioners Cleberson Quadrelli, Evens Dry, and Abdy Nizeyimana hereby respectfully submit the attached Memorandum of Decision entered today in *Celimen Savino et al. v. Souza*, C.A. No. 20-10617-WGY (D. Mass.) (the “*Savino* Order”).

Much like this matter, the *Savino* case is a class action seeking the release of civil immigration detainees from the Bristol County House of Correction due to unsafe conditions arising from the ongoing COVID-19 pandemic. Among other things, today’s order finds that the “minimal” COVID-19 testing performed to date in the Bristol facility was among the “acute flaws” and “critical safety gaps that establish a likelihood of irreparable harm to the detainees.” *See Savino* Order, at 14-15, 29. After concluding that the class would likely succeed on the merits of

its due process claim, the court entered a preliminary injunction requiring universal testing of all immigration detainees and staff who interact with them, among other things.

Petitioners note that, although Plymouth actually houses *more* prisoners/detainees than Bristol, it appears that Plymouth has tested substantially *fewer* of them than even Bristol. *See* Special Master's Weekly Report, *CPCS v. Chief Justice of the Trial Court* (No. SJC-12926), at App'x 4, 12 (reporting 47 prisoners/detainees tested at Bristol, and only 17 prisoners/detainees tested at Plymouth), *available at* <https://www.mass.gov/doc/sjc-12926-special-masters-weekly-report-51120/download>.

Respectfully submitted,

May 12, 2020

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